

# EXHIBIT 3



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December 31, 2019

**By Electronic Mail**

Anne Kearsce  
Motley Rice LLC  
28 Bridgeside Blvd.  
Mount Pleasant, SC 29464

**Re: In Re National Prescription Opioid Litigation, No. 17-md-2804**

*City of Huntington West Virginia v. AmerisourceBergen Drug Corporation, et al.*, Case No. 1:17-op-45054 (S.D. W. Va.)

Dear Counsel,

I write on behalf of AmerisourceBergen Drug Corporation, Cardinal Health, Inc., and McKesson Corporation to identify custodial sources of relevant documents (including ESI) that are within the City of Huntington's possession, custody, or control. This request is made pursuant to CMO No. 3, paragraph 4, and it addresses custodial sources only. It is not intended to diminish the City's obligation to marshal and produce documents from custodial and non-custodial sources known to the County.

We request production from the custodial files of the individuals listed by name or position on Exhibit A. We have included individuals you identified in discovery responses, as well as additional custodial sources whom we identify either by name or by description. Please confirm that you will produce custodial files for each of the identified custodial sources, as well as identify by name the custodians whom we have described by position. We reserve the right to identify additional custodial sources as discovery and investigation continue.

Thank you for attention to this request. We look forward to conferring further with you on this topic.

Very truly yours,

/s/ Steven J. Boranian

Steven J. Boranian

SJB:dr

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Exhibit A

- **Krishawna Harless** – City of Huntington Former Mental Health Liaison/LEAD Coordinator
- **Timothy Hazelett** – Cabell County Health Department Administrator
- **Michelle Perdue** – Cabell-Huntington Health Department Harm Reduction Coordinator
- **Elizabeth Adkins** – Cabell-Huntington Health Department Health and Wellness Coordinator
- **Michael Kilkenny** – Cabell-Huntington Health Department Physician Director, Cabell-Health Department
- **Rocky Johnson** – City of Huntington Former Police Captain
- **Paul Hunter** – City of Huntington Police Captain and Supervisor of Drug Task Force
- **Ray Cornwell** – City of Huntington Police Captain
- **Dan Underwood** – City of Huntington Police Captain, Administrative Bureau
- **Hank Dial** – City of Huntington Police Chief
- **Joe Ciccarelli** – Former City of Huntington Police Chief
- **Skip Holbrook** - Former City of Huntington Police Chief
- **Gene Baumgardner** - Former City of Huntington Police Chief
- **Stephanie Coffey** – City of Huntington Police Corporal; QRT member
- **Craig Preece** – City of Huntington Police Detective
- **Ernie Blackburn** – City of Huntington Police Detective
- **Paul Minigh** – City of Huntington Police Sergeant
- **Jim Johnson** – Former City of Huntington Police Chief; City of Huntington Former Director of Mayor's Office of Drug Control Policy [Listed here and under Executives.]
- **John Ellis** – City of Huntington Police Captain
- **Shane Bills** – City of Huntington Police Detective
- **Kathy Moore** – City of Huntington Finance Director (2017-present); Budget Director (2016-2017)
- **Pam Chandler** – City of Huntington Finance Director (2015-2017)
- **Deron Runyon** – City of Huntington Finance Director (2009-2015)
- **Robert Wilhelm** – City of Huntington Finance Director (2001-2008)
- **Glenn White** – City of Huntington Finance Director (1987-2001)
- **Scott Arthur** – City of Huntington Budget Director (2017-present)
- **Rick Montgomery** – City of Huntington Budget Director (2017-2017)
- **Darla Bentley** – City of Huntington Budget Director (2003-2016)
- **Cathy Burns** – Huntington Municipal Development Authority Executive Director; Former/Acting City Manager/Director of Administration and Finance, City of Huntington (2016-2019)
- **Margaret Mary Layne** - City Manager/Director of Administration and Finance (2014-2016)
- **Brandi-Jacobs Jones** – City Manager/Director of Administration and Finance (2007-2014)

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- **Jack Thornburg** - City Manager/Director of Administration and Finance (2001-2007)
- **David Harrington** - City Manager/Director of Administration and Finance (1993-2001)
- **Scott Damron** – City Attorney
- **Barbara Miller** – City Clerk
- **Teresa Ferguson-Crossan** – Huntington Municipal Court, Clerk
- **Jan Rader** – City of Huntington Fire Chief; former member of Mayor’s Office of Drug Control Policy
- **Carl Eastham** – Former City of Huntington Fire Chief
- **Creig Moore** – Former City of Huntington Fire Chief
- **Greg Fuller** – Former City of Huntington Fire Chief
- **Justin Antle** – City of Huntington Fire Deputy Chief
- **Ray Canafax** – City of Huntington Fire Deputy Chief
- **Bryan Chambers** – City of Huntington Communications Director (Mayor’s office)
- **Angie Bracey** – Executive Assistant to the Mayor
- **Jim Johnson** – City of Huntington Former Director of Mayor’s Office of Drug Control Policy (2014-2017)
- **Brandon White** – City of Huntington Former IT Director
- **James Bumgardner** – City of Huntington Human Resources Director (Interim 2001)
- **John Queen** - City of Huntington Human Resources Director (2001)
- **Russel Houck** - City of Huntington Human Resources Director (1995-2001)
- **Kohson Perkins** – City of Huntington IT Director
- **Steve Williams** – City of Huntington Mayor (2013-present); City-County Task Force Addressing Heroin and Opioid Abuse Member
- **Roger Kim Wolfe** – City of Huntington Mayor (2009-2012)
- **David Felinton** – City of Huntington Mayor (2001-2008)
- **Jean Dean** – City of Huntington Mayor (1993-2000)
- **Scott Lemley** – City of Huntington Planning and Development Director
- **Breanna Shell** – City of Huntington Planning Director
- **Sherry Lewis** – City of Huntington Human Resources Director
- **Jim Insko** – City of Huntington Public Works Director
- **Kim Bailey** – City of Huntington Purchasing Director
- **Ryan Saxe** – City of Huntington Superintendent of Cabell County Board of Education
- **Joyce Clark** – City of Huntington City Council Member, District 1
- **Charles McComas** – City of Huntington City Council Member, District 2
- **Alex Vence** – City of Huntington City Council Member, District 3; Vice Chairman
- **Jennifer Wheeler** – City of Huntington City Council Member, District 4
- **Tonia Kay Page** – City of Huntington City Council Member, District 5
- **Mark A. Bates** – City of Huntington City Council Member, District 6; Chairman
- **Mike Shockley** – City of Huntington City Council Member, District 7
- **Tom McGuffin** – City of Huntington City Council Member, District 8
- **Ted V. Kluemper Jr.** – City of Huntington City Council Member, District 9
- **Rebecca Howe** – City of Huntington City Council Member, At-Large

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- **Carol Polan** – City of Huntington City Council Member, At-Large

We further request identification of and production from sources likely to have custody of documents and ESI relating to:

- Executive leadership
- Plaintiff's organizational structure
- Law enforcement (including but not limited to prior City Attorneys and City Clerks)
- Courts and other judicial bodies (including but not limited to drug courts)
- Prosecution of civil and criminal offenses
- Child and family services
- Regulation of the provision of healthcare
- Regulation of prescription medicines (including but not limited to FDA and other governmental regulators)
- Regulation of controlled substances (including but not limited to DEA and other governmental regulators)
- Budget, finance, and expenditures
- Fire, rescue, and emergency services
- Public health
- Addiction or mental health services
- Local hospitals and other healthcare providers
- Pharmacies and the dispensing of prescription drugs
- Social services (including but not limited to services for homelessness)
- Human resources
- Investigation of drug overdose (including but not limited to medical examiners and coroners)
- Correctional facilities and jailers
- Pharmacy benefit managers
- Benefits plans (public and private)
- "Task forces" or comparable bodies related to drug use (including but not limited to those who worked on the City-County Task Force Addressing Heroin and Opioid Abuse)